

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 20 C 5384
)	
GLASS DESIGNERS, INC., an Illinois)	JUDGE JOAN H. LEFKOW
corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, GLASS DESIGNERS, INC., an Illinois corporation, in the total amount of \$22,593.79, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$4,874.75.

On September 21, 2020, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on October 12, 2020. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 216-2573
Telefax: (312) 236-0241
E-Mail: pryan@baumsigman.com

I:\MIDJ\Glass Designers\2020 Litigation\motion-default judgment.pnr.df.wpd

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM-ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 9th day of November 2020:

Mr. William Jones, Registered Agent
Glass Designers, Inc.
PO Box 164
South Holland, IL 60473-0164

Mr. William Jones, Registered Agent
Glass Designers, Inc.
807 Manor Court
Glenwood, IL 60425-1214

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 216-2573
Telefax: (312) 236-0241
E-Mail: pryan@baumsigman.com